



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 8, 2013

BEN LOMBARD, TREASURER
MAINE REPUBLICAN PARTY
9 HIGGINS STREET
AUGUSTA, ME 04330

Response Due Date
02/12/2013

IDENTIFICATION NUMBER: C00003111

REFERENCE: AMENDED JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012),
RECEIVED 08/22/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 12 item(s):

1. The totals listed on Line(s) 6(c), 11(a)(ii), 11(a)(iii), 11(d), 19, 20, 21(a)(i) and 21(b), Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))
2. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (2 U.S.C. § 434(b))
3. Your Amended Mid-Year (1/1/11-6/30/11), received 1/31/12, Amended Year End (7/1/11-12/31/11), received 6/26/12 and Amended July Quarterly (4/1/12-6/30/12), received 8/22/12, Reports disclose a substantial increase in certain categories of receipts and debts owed to one or more vendors from the amounts disclosed on your original reports (see attached). Please amend your report or provide an explanation to clarify why this additional activity was not provided with your original reports. (11 CFR § 104.3)

MAINE REPUBLICAN PARTY

Page 2 of 6

4. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer and occupation entries appear on your report and are not considered acceptable: "Information Requested/Information Requested," "Requested Employer Information/Information Requested" and "Requested Employer Information/Mental Health Worker."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled

MAINE REPUBLICAN PARTY

Page 3 of 6

reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

5. Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report(s). (11 CFR §§ 104.3(d) and 104.11) Please file an amendment to your report to disclose the current status of these omitted debts: "Fls Connect" and "Katie Desfosses."

6. Schedule D of your report itemizes debt owed to "Fls Connect," "Staples," "City of Augusta," "Albison's Printing," "Riverside Disposal," "Time Warner Cable" and "Unicel" with an outstanding beginning balance(s) not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))

7. On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. Please amend your report by providing the correct event year-to-date totals. (11 CFR §§ 104.10(b)(2) and 104.17(b)(1)(ii))

8. Schedules B and H4 of your report disclose a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement have to be itemized as memo entries regardless of the amount. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Please amend your report to include the missing information and clearly identify on the Schedule H4, which reimbursement each memo entry

MAINE REPUBLICAN PARTY

Page 4 of 6

relates to. (11 CFR §§104.10 and 104.17, and Advisory Opinion 1996-20, footnote 3)

9. Schedule H4 of your report discloses reimbursements to individuals for "reimbursement-name badges- convention," "cleaning & reimbursement," "reimbursement- convention expense" and "reimbursement for paper." Please be advised that when itemizing reimbursements to individuals for goods or services, payment to the original vendors must be itemized as memo entries regardless of amount. Each memo entry must include the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule H4, which reimbursement each memo entry relates to. (11 CFR § §104.10 and 104.17, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

10. Your Amended July Quarterly Report (4/1/12-6/30/12), received 8/22/12, does not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.

11. Your Amended July Quarterly Report (4/1/12-6/30/12), received 8/22/12, discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state, district or local party committee utilizing separate federal and non federal accounts is required to allocate any administrative expenses (excluding salary) between the accounts according to a fixed percentage selected on Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. Payments for salary and wages for employees who spend more than 25% of their compensated time on Federal election activities or on activities in connection with a Federal election must be made from a federal account and disclosed on a Schedule B supporting Line 30(b) of the Detailed Summary Page. (11 CFR §106.7)

MAINE REPUBLICAN PARTY

Page 5 of 6

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b. Payments to a consulting, law or accounting firm will be considered acceptable for salary.

Clarification regarding administrative expenses should be provided during each two year election cycle beginning with the first report filed in the non election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

12. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "team 4000" and "team 4000 banner." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

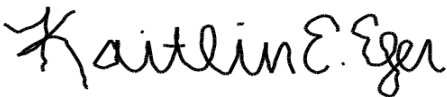
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

MAINE REPUBLICAN PARTY

Page 6 of 6

Sincerely,

A handwritten signature in black ink that reads "Kaitlin Eger". The signature is written in a cursive style with a large, stylized "K" and a distinct "E".

Kaitlin Eger
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Overview of Additional Receipts

Report Name	Total Additional Receipts	Line Number(s)
July Quarterly Report/Amended July Quarterly Report, received 8/22/12	\$11,340.80	11(a)(i)
Total Additional Receipts	\$11,340.80	

Overview of Additional Debts

Report Name	Total Additional Debts	Line Number(s)
2011 Mid-Year Report/Amended 2011 Mid-Year Report, received 1/31/12	\$5,165.20	10
2011 Year End Report/Amended 2011 Year End Report, received 6/26/12	\$3,070.00	10
July Quarterly Report/Amended July Quarterly Report, received 8/22/12	\$6,319.01	10
Total Additional Debts	\$14,554.21	

Total Increase in Activity on Amended Reports: \$25, 895.01